

R. DALE GRIMES
TEL: (615) 742-6244
FAX: (615) 742-2744
dgrimes@bassberry.com

BASS, BERRY & SIMS, P.L.C.

A PROFESSIONAL LIMITED LIABILITY COMPANY
ATTORNEYS AT LAW

AMSouth CENTER
315 DEADERICK STREET, SUITE 2700
NASHVILLE, TN 37238-3001
(615) 742-6200

www.bassberry.com

OTHER OFFICES:

NASHVILLE MUSIC ROW
KNOXVILLE
MEMPHIS

2003 OCT -1 PM 1:55

I.R.A. DOCKET ROOM

October 1, 2003

VIA HAND DELIVERY

Ms. Deborah Taylor Tate, Chairman
TENNESSEE REGULATORY AUTHORITY
460 James Robertson Parkway
Nashville, Tennessee 37243

**Re: *Workshop to Gather Information from the Telecommunications Industry
Related to Preventing Violations of Tenn. Code Ann. § 65-21-114,
Docket No. 03-00502***

Dear Chairman Tate:

Enclosed for filing in the above-styled matter are the original and thirteen copies of Loretto Telephone Company's response to Director Jones' request for information in the above-referenced docket. Should you have any questions with respect to this filing, please do not hesitate to contact me at the number shown above.

Thanking you in advance for your assistance with this matter, I am

Very truly yours,



R. Dale Grimes

RDG/ts
Enclosures

cc: Ms. Desda Hutchins

October 1, 2003

Director Ron Jones
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

IN RE: Workshop to Gather Information from the Telecommunications Industry Related
to Preventing Violations of Tenn. Code Ann. § 65-21-114

Dear Director Jones:

Telephone calls made by all of our 6,134 customers within Lawrence County are treated as toll-free and are not billed to any customer.

There are 3 Giles County customers and 6 Wayne County customers that do not receive toll-free service within their respective counties. We did inform those customers to notify us of any toll calls to their respective County Seat, so that we could make an adjustment to their bill.

In order to provide County Wide Calling to the remaining 9 customers, an expensive software program would have to be specially written to compare toll calls made by those 9 customers to a database of their respective counties' telephone numbers. Then the billing of that particular toll call would have to be suppressed within the billing system. Any adjustments for unbilled calls would have to be reconciled between the two telecommunications companies involved.

A more practical solution would be to inform those customers to notify us of any toll call within their respective County, so that an adjustment could be made to their bill.

Sincerely,

Louise Brown, President
Loretto Telephone Company, Inc.

R. DALE GRIMES
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FAX: (615) 742-2744
dgrimes@bassberry.com

BASS, BERRY & SIMS PLC
A PROFESSIONAL LIMITED LIABILITY COMPANY
ATTORNEYS AT LAW

AMSOUTH CENTER
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OTHER OFFICES:

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T.R.A. DOCKET ROOM

October 1, 2003

VIA HAND DELIVERY

Ms. Deborah Taylor Tate, Chairman
TENNESSEE REGULATORY AUTHORITY
460 James Robertson Parkway
Nashville, Tennessee 37243

**Re: *Workshop to Gather Information from the Telecommunications Industry
Related to Preventing Violations of Tenn. Code Ann. § 65-21-114,
Docket No. 03-00502***

Dear Chairman Tate:

Enclosed for filing in the above-styled matter are the original and thirteen copies of Ardmore Telephone Company's response to Director Jones' request for information in the above-referenced docket. Should you have any questions with respect to this filing, please do not hesitate to contact me at the number shown above.

Thanking you in advance for your assistance with this matter, I am

Very truly yours



R. Dale Grimes

RDG/ts
Enclosures

cc: Mr. Terry Wales

Ardmore Telephone Company
Response to Docket 03-00502

1. Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. 65-21-114(a).

Response: Ardmore records all of the county-wide calls. These calls are then compared to the BellSouth TAR code database. Any call that is in this database is not billed to the customer.

2. Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. 65-21-114(a).

Response: The major problem we experience is with virtual NXX's. These are CLEC and Wireless numbers advertised and sold as local and toll-free but are not located in the same county nor are they in the BellSouth TAR code database. When these numbers are used for internet dial-up, customers can receive a very large bill.

3. Provide a suggestion for how this workshop should proceed.

Response: Require CLEC's to place NXX's that are in the same county in the BellSouth TAR Code database.

R. DALE GRIMES
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dgrimes@bassberry.com

BASS, BERRY & SIMS, PLC
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ATTORNEYS AT LAW

AMSOUTH CENTER
315 DEADERICK STREET, SUITE 2700
NASHVILLE, TN 37238-3001
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OTHER OFFICES:

NASHVILLE MUSIC ROW
KNOXVILLE
MEMPHIS

2003 OCT -1 PM 1:41

T.R.A. DOCKET ROOM

October 1, 2003

VIA HAND DELIVERY

Ms. Deborah Taylor Tate, Chairman
TENNESSEE REGULATORY AUTHORITY
460 James Robertson Parkway
Nashville, Tennessee 37243

**Re: *Workshop to Gather Information from the Telecommunications Industry
Related to Preventing Violations of Tenn. Code Ann. § 65-21-114,
Docket No. 03-00502***

Dear Chairman Tate:

Enclosed for filing in the above-styled matter are the original and thirteen copies of TDS Telecom's response, on behalf of Humphreys County Telephone Company, Tennessee Telephone Company, Tellico Telephone Company and Concord Telephone Exchange, to Director Jones' request for information in the above-referenced docket. Should you have any questions with respect to this filing, please do not hesitate to contact me at the number shown above.

Thanking you in advance for your assistance with this matter, I am

Very truly yours,



R. Dale Grimes

RDG/ts
Enclosures

cc: Mr. Bruce Mottern

TDS TELECOM – TENNESSEE OPERATIONS
TRA DOCKET 03-0502
DATA REQUESTED DATED SEPTEMBER 16, 2003

1. **Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reasons for not doing so.**

After Tenn. Code Ann. § 65-21-114(a) became effective and all telephone customers within the state of Tennessee were to be provided free intra-county calling, BellSouth assumed the responsibility for maintaining a statewide database to identify these intra-county messages. In TDS Telecom's customer billing system, each customer account has an identifying County Code on file. In Tennessee, each County Code also has a Taxing Area (TAR) Code assigned to it by BellSouth. It is the responsibility of each participating Local Exchange Carrier (LEC) to supply BellSouth with data on all access lines within the LEC's serving area. This data is loaded to tape and shipped to BellSouth semi monthly. In turn, BellSouth will provide a complete copy of the statewide database to each participating LEC to use to identify intra-county messages and prevent intra-county calls from being billed to the Company's customers.

The first set of customer data tapes created for each TDS company in Tennessee were sent to BellSouth and used to load the database in July 1993. From this point forward, the database is updated semi monthly.

2. **Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. § 65-21-114(a).**

The Company believes that short of real-time customer record updating throughout Tennessee, the biweekly updates currently in place are the most efficient and practical method of ensuring compliance with County-Wide calling in Tennessee.

A timing issue may arise in the administration of countywide calling within Tennessee. For example, where a customer has signed up for service and the tapes have just been sent to BellSouth. From this point in time there is a possibility whereby the TAR code for the customer is not in the system. This may result in billing an intra-county call as toll. This inaccuracy is corrected when the tapes are updated every two weeks and the customers account is properly adjusted.

3. **Provide a suggestion for how this workshop should proceed.**

At this time, TDS Telecom is unsure how this workshop should proceed simply because the Company does not understand the complete set of issues, if any, that may exist in regards to implementing county wide calling.



RECEIVED

2003 OCT -1 AM 11:16

September 30, 2003

T.R.A. DOCKET ROOM

Mr. Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

In Re: Workshop to Gather Information from the Telecommunications Industry Related to Preventing Violations of Tenn. Code Ann. Para. 65-21-114 (Docket No. 03-00502)

VIA OVERNIGHT DELIVERY

Dear Mr. Jones:

We received yesterday your Notice of Filing dated September 16, 2003. We are pleased to provide the following response:

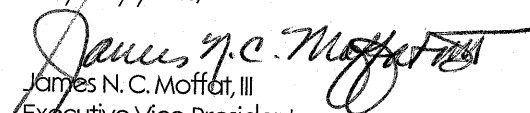
CommuniGroup has implemented steps in its billing systems that apply additional logic to intrastate calls in Tennessee. CommuniGroup participates in the Tax and Rate file distribution from BellSouth that detail the taxing area by county of each telephone number in the State of Tennessee. The additional logic applied examines the Tax and Rate code that indicates the County where each telephone number resides, and if the codes match the call is rated at no charge.

CommuniGroup has encountered significant development costs in support of this requirement. Modifications to software included coding and warehousing a new data table to support the Tax and Rate file, as well as the added delay and impact in the rating processes to support two additional record lookups on each intrastate Tennessee call. As expected, this file is extremely large, and requires updates twice monthly. Since many customers are unaware of the requirement, this ruling introduces questions into our Customer Care arena as to why some calls have charges, and some do not.

We suggest that one way the Workshop could proceed is to review the effect of determining the free calls within the County using a wire center concept as opposed to that methodology that is in place today.

Should you need further information at this time, please do not hesitate to let us know.

Very truly yours,


James N. C. Moffat, III
Executive Vice-President

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2003 OCT -1 AM 11:16

T.R.A. DOCKET ROOM

**NetSolutions**

by Inter-Tel

4310 E. Cotton Center Boulevard
Building A, Suite 100
Phoenix, Arizona, 85040

29 September 2003

Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

To whom it may concern,

We were courtesy copied on Docket number 03-00502, requesting information on the manner in which we provide telecommunications service in Tennessee.

NetSolutions, Inc., is a reseller of long distance telephone services. As such, we would have no opportunity to charge for any local calls which occur between two points in the same county in Tennessee.

Sincerely,

D. Holly Thomas
Controller, Network Services.RECEIVED
RON JONES

OCT - 1 2003

TN REGULATORY AUTHORITY

ITC DELTACOM®

RECEIVED

4092 Memorial Parkway South ► Huntsville, AL 35802 ► 256.382.3843 Phone
256.382.3836 Fax

2003 OCT -1 AM 11:16

T.R.A. DOCKET ROOM

Via Fax & Overnight Mail

October 1, 2003

Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: Docket 03-00502
Workshop to Gather Information on County-wide Calling

Dear Mr. Jones:

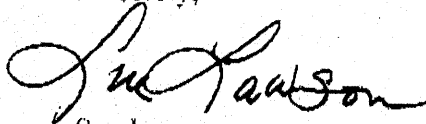
Pursuant to the information requested by the TRA on September 16, 2003, ITC^DeltaCom has in place steps for compliance with Tennessee Code Ann. § 65-21-114, which states any telephone call made between two (2) points in the same county in Tennessee shall be classified as toll-free and shall not be billed to any customer.

ITC^Deltacom uses a two-step process for verifying calls made between two (2) points in the same county as follows:

- **Step 1**
Mileage of the call is checked using Vertical & Horizontal (V&H) coordinates from the Local Exchange Routing Guide (LERG). If the mileage is less than or equal to 16 miles, the call is then dropped and not billed.
- **Step 2**
The originating and terminating NPA/NXX is used to retrieve the GeoCode from the tax package (the GeoCode being a number in SS-CCC-LLL format where SS=State, CCC=County, and LLL=City/Location). County codes are then compared, and if they are the same, the call is dropped and not billed.

In both steps the call is still listed on the customers bill, but is zero rated.
Should you need additional information, please feel free to contact me at 256-382-3967.

Sincerely,



Sue Lawson
Regulatory Manager

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RON JONES

OCT - 1 2003

TN REGULATORY AUTHORITY



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2003 OCT -1 AM 11:16

T.R.A. DOCKET ROOM

September 30, 2003

Tennessee Regulatory Authority
Attn: Mr. Ron Jones
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: McLeodUSA Telecommunications Services Inc's Response to the Inquiry
Concerning Preventing Violations of Tenn. Code Ann. § 65-21-114

Dear Mr. Jones:

I am responding to your request for information, dated September 16, 2003, concerning how McLeodUSA Telecommunications Services Inc. (McLeodUSA) provides telecommunications service in compliance with Tenn. Code Ann. § 65-21-114. The responses outlined below were provided by Eric Strickland – McLeodUSA Manager, Product Management.

Inquiry 1:

Describe the manner in which you are able to provide telecommunications services in compliance with § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.

Response to Inquiry 1:

McLeodUSA is certified in the state of Tennessee to offer local and long distance service via Facilities – Based and Resale platforms. However, McLeodUSA is currently only offering long distance service in Tennessee. It is the responsibility of the Local service provider to correctly define the Local Calling area to accommodate the provisions within Tenn. Code Ann. § 65-21-114. Therefore, the Local service provider defines local calling areas, and based on these definitions, also defines each call as Local or Long Distance upon call origination. As a result, McLeodUSA will be handling only Long Distance traffic as defined by the Local service provider. Accordingly, McLeodUSA is in compliance with Tenn. Code Ann. § 65-21-114. If, at any time in the future, McLeodUSA expands its Local service offering into Tennessee, all Local Calling areas will be defined in consideration of these provisions.

Inquiry 2:

Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. § 65-21-114(a).

Response to Inquiry 2:

None that we are aware of.

Inquiry 3:

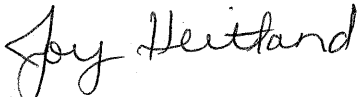
Provide a suggestion for how this workshop should proceed.

Response to Inquiry 3:

None.

If you have questions concerning McLeodUSA's responses, please feel free to contact me directly at (319) 790-6142 or at jheitland@mcleodusa.com.

Sincerely,

A handwritten signature in cursive script that reads "Joy Heitland".

Joy Heitland

McLeodUSA Telecommunications Services, Inc.



RECEIVED

2003 OCT -1 AM 11:16

T.R.A. DOCKET ROOM

September 30, 2003

Mr. Ron Jones
Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

RE: TDS Long Distance Corporation Response to Inquiry Related to Preventing Violations of Tenn. Code Ann. § 65-21-114

Dear Mr. Jones:

Attached please find TDS Long Distance Corporation's response to your questions related to preventing violations of Tenn. Code Ann. § 65-21-114.

If you have any questions regarding the attached information, please contact me at 608-664-4148 or via e-mail at jennifer.lautenschleger@tdstelecom.com.

Sincerely,

Jennifer R. Lautenschleger
Manager – External Relations

Attachment

535 JUNCTION ROAD
MADISON, WI 53717

P.O. BOX 5158
MADISON, WI 53705-0158

TDS Long Distance Corporation- TENNESSEE OPERATIONS
TRA DOCKET 03-0502
DATA REQUESTED DATED SEPTEMBER 16, 2003

1. **Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reasons for not doing so.**

TDS Long Distance Corporation is a toll reseller, does not own any facilities and does not bill any of its customers directly. TDS Telecom is the billing and collection agent for TDS Long Distance Corporation and ensures that this compliance occurs. They submitted the following response to this question.

After Tenn. Code Ann. § 65-21-114(a) became effective and all telephone customers within the state of Tennessee were to be provided free intra-county calling, BellSouth assumed the responsibility for maintaining a statewide database to identify these intra-county messages. In TDS Telecom's customer billing system, each customer account has an identifying County Code on file. In Tennessee, each County Code also has a Taxing Area (TAR) Code assigned to it by the affiliated Bell Company. It is the responsibility of each participating Local Exchange Carrier (LEC) to supply BellSouth with data on all access lines within the LEC's serving area. This data is loaded to tape and shipped to BellSouth semi-monthly. In turn, BellSouth will provide a complete copy of the statewide database to each participating LEC to use to identify intra-county messages and prevent intra-county calls from being billed to the Company's customers.

The first set of customer data tapes created for each TDS company in Tennessee were sent to BellSouth and used to load the database in July 1993. From this point forward, the database is updated semi-monthly.

2. **Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. § 65-21-114(a).**

TDS Long Distance Corporation is a toll reseller, does not own any facilities and does not bill any of its customers directly. TDS Telecom is the billing and collection agent for TDS Long Distance Corporation and submitted a response to this question.

3. **Provide a suggestion for how this workshop should proceed.**

TDS Long Distance Corporation is a toll reseller, does not own any facilities and does not bill any of its customers directly. TDS Telecom is the billing and collection agent for TDS Long Distance Corporation and submitted a response to this question.

TelCove

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T.R.A. DOCKET ROOM

Sender's Direct Dial: (814) 260-2801

Facsimile: (814) 260-2026

E-mail: terry.romine@telcove.com

September 30, 2003

VIA OVERNIGHT DELIVERY

Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

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RON JONES

OCT - 1 2003

TN REGULATORY AUTHORITY

Re: Adelphia Business Solutions of Nashville, L.P.
Adelphia Business Solutions Operations, Inc.
Compliance with Tennessee Code Annotated Section 65-21-114

Adelphia Business Solutions of Nashville, L.P. and Adelphia Business Solutions Operations, Inc.,¹ ("ABS") provide responses to the inquiries set forth in the September 16, 2003 Notice of Filing. We ask that you date-stamp the enclosed proof of filing copy of this response and return it to us in the accompanying self-addressed, postage pre-paid envelope:

1. Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.

Response: ABS currently complies with § 65-21-114(a). ABS's billing system compares the originating and termination numbers of every Tennessee-originated call against the current BellSouth TAR master file to determine if the numbers are in the same county. If the originating and termination numbers are in the same county, the billing system classifies the call as toll free and there is no charge for the call to the end user.

2. Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. § 65-21-114(a).

Response: ABS currently is not experiencing any technical, operational, administrative or other difficulties in complying with § 65-21-114(a).

¹ Adelphia Business Solutions Operations, Inc. currently does not provide any commercial local exchange services within Tennessee.

3. Provide a suggestion for how this workshop should proceed.

Response: ABS has no suggestion in that it currently is able to comply with this provision of the Tennessee Code.

The undersigned will be the point of contact for the companies in this matter.

Sincerely,



Terry J. Romine
Deputy General Counsel of Operations

cc: John Glicksman
Jennifer Anderson
Sheldon Shapiro

MILLER ISAR INC.

REGULATORY CONSULTANTS

STACEY A. KLINZMAN

7901 SKANSIE AVENUE,
SUITE 240
GIG HARBOR, WA 98335
TELEPHONE: 253.851.6700
FACSIMILE: 253.851.6474
HTTP://WWW.MILLERISAR.COM

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2003 OCT -1 PM 12:35

T.R.A. DOCKET ROOM

Via Facsimile and Two Day Delivery

October 1, 2003

Mr. Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: U.S. Telecom Long Distance, Inc. ("U.S. Telecom") – Docket No. 03-0052
Responses to Tennessee Regulatory Authority ("TRA") Directive of September 16, 2003

Dear Mr. Jones:

U.S. Telecom Long Distance, Inc., a Tennessee certificated intrastate long distance reseller, hereby responds to the TRA's directive of September 16, 2003, requesting information on carriers' compliance with Tenn. Code Ann. § 65-21-114, which requires all intracounty calls to be toll free:

- Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.

Response: U.S. Telecom is unable to comply with Tenn. Code Ann. § 65-21-114(a) for the following reasons:

1. As a non-facilities based carrier, U.S. Telecom does not own, operate or manage equipment or facilities that would enable it to distinguish intracounty calls from other intrastate calls.
2. U.S. Telecom's underlying carrier, Qwest, does not provide U.S. Telecom with CARE records that distinguish intracounty calls from other instate calls.
3. Qwest charges U.S. Telecom for all calls carried over its network, including intracounty calls.

Mr. Ron Jones
October 1, 2003
Page 2 of 2

- Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. § 65-21-114(a).

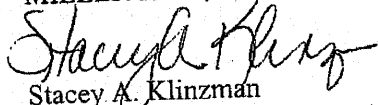
Response: See response above.

- Provide a suggestion for how this workshop should proceed.

Response: U.S. Telecom has no suggestions for how the workshop should proceed.

Sincerely,

MILLER ISAR, INC.



Stacey A. Klinzman
Director - Regulatory Compliance

Regulatory Consultants to
U.S. Telecom Long Distance, Inc.

cc: Mr. Robert Young, President, U.S. Telecom Long Distance, Inc.

MILLER ISAR INC.

REGULATORY CONSULTANTS

STACEY A. KLINZMAN

7901 SKANSIE AVENUE,
SUITE 240

GIG HARBOR, WA 98335

TELEPHONE: 253.851.6700

FACSIMILE: 253.851.6474

HTTP://WWW.MILLERISAR.COM

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2003 OCT -1 PM 12:35

T.R.A. DOCKET ROOM

Via Facsimile and Two Day Delivery

October 1, 2003

Mr. Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Business Discount Plan, Inc. ("BDP") – Docket No. 03-0052
Responses to Tennessee Regulatory Authority ("TRA") Directive of September 16, 2003

Dear Mr. Jones:

Business Discount Plan, Inc., a Tennessee certificated intrastate long distance reseller, hereby responds to the TRA's directive of September 16, 2003, requesting information on carriers' compliance with Tenn. Code Ann. § 65-21-114, which requires all intracounty calls to be toll free:

- Describe the manner in which you are able to provide telecommunications service in compliance with Tenn. Code Ann. § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.

Response: BDP is unable to comply with Tenn. Code Ann. § 65-21-114(a) for the following reasons:

1. As a non-facilities based carrier, BDP does not own, operate or manage equipment or facilities that would enable it to distinguish intracounty calls from other intrastate calls.
2. BDP's underlying carrier, AT&T, does not provide BDP with CARE records that distinguish intracounty calls from other instate calls.
3. AT&T charges BDP for all calls carried over its network, including intracounty calls.

Mr. Ron Jones
October 1, 2003
Page 2 of 2

4. BDP has not received any complaints from customers regarding intracounty call charges on bills and, therefore, is not aware of whether AT&T is passing through intracounty calls to BDP.

- Identify any technical, operational, administrative or other difficulties encountered when attempting to comply with Tenn. Code Ann. § 65-21-114(a).

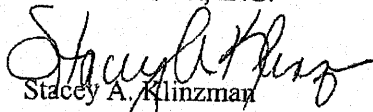
Response: See response above.

- Provide a suggestion for how this workshop should proceed.

Response: BDP has no suggestions for how the workshop should proceed.

Sincerely,

MILLER ISAR, INC.


Stacey A. Klinzman
Director Regulatory Compliance

Regulatory Consultants to
Business Discount Plan, Inc.

cc: Mr. David Jenkins, President, Business Discount Plan, Inc.



RECEIVED

BellSouth BSE, Inc.
North Terraces Building
400 Perimeter Center Terrace
Suite 350
Atlanta, Georgia 30346

2003 OCT -1 PM 12:00

TRA DOCKET ROOM

Mario L. Soto
President
678 443-3937
Fax: 678 443-3470

RECEIVED
RON JONES

SEP 23 2003

September 19, 2003

TN REGULATORY AUTHORITY

Ron Jones, Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: Workshop to Gather Information from the Telecommunications Industry Related to Preventing Violations of Tenn. Code Ann. § 65-21-114

Dear Director Jones,

In response to the TRA's Notice of Filing dated September 16, 2003, please note that BellSouth BSE, Inc. (BSE) is not currently providing service in the state of Tennessee. Therefore, BSE has no information to provide the TRA concerning the inquiries in the Notice of the Filing.

As acknowledgement of receipt of this letter, please date stamp the extra copy of this letter and return it to me in the pre-addressed, self-stamped envelope provided for this purpose.

Please contact me should you have any questions concerning this response.

Sincerely,



RECEIVED

2003 OCT -1 AM 11:17

September 30, 2003

T.R.A. DOCKET ROOM

VIA OVERNIGHT MAIL

Director Ron Jones
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

RE: Docket 03-00502 – Response of Network Telephone Regarding
Implementation of Countywide Calling

Dear Director Jones:

Network Telephone submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of Tennessee Code Ann. 65-21-114 (a).

Network Telephone subscribes to BellSouth's TAR file and we are submitting our facilities-based Tennessee telephone numbers to the TAR file. To date the procedure has been manual, but we are moving to an automated file-sharing process in October.

Fully integrating the TAR information into our billing database has been more difficult, but Network Telephone is continuing to work on this process. NTC has a very limited facilities-based service area in Tennessee. We have not had any complaints from end-user customers with regard to incorrect countywide billing, and plan to have the TAR information fully integrated shortly.

NTC has no suggestions as to the format of the workshop, but does suggest that the countywide process from a facilities-based perspective could perhaps be managed with a required county designation through an independent database administrator, or in the LERG, in which the E911 address is used to identify each number by county location, even if the number is moved or ported to another carrier.

If you have any questions, please let me know.

Sincerely,

Margaret H. Ring, Director
Regulatory & Governmental Affairs



210 N. Park Ave.
Winter Park, FL
32789

P.O. Drawer 200
Winter Park, FL
32790-0200

Tel: 407-740-8575
Fax: 407-740-0613
tmi@tminc.com

Mr. Ron Jones
Director/Moderator
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219-0412

RECEIVED
September 30, 2003
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2003 OCT -1 AM 11:18

T.R.A. DOCKET ROOM

**Re: Docket 03-00502; Implementation of County Wide Calling
Response of Bell Atlantic Communications, Inc. d/b/a Verizon Long
Distance and NYNEX Long Distance Company d/b/a Verizon Enterprise
Solutions**

Dear Mr. Jones:

Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance and NYNEX Long Distance Company d/b/a Verizon Enterprise Solutions submit the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance and NYNEX Long Distance Company d/b/a Verizon Enterprise Solutions (Verizon long distance affiliates), which are affiliated companies authorized to provide long distance telecommunications services in Tennessee, are in compliance with the toll free county-wide calling requirements mandated by Tennessee state law (T.C.A. § 65-21-114).

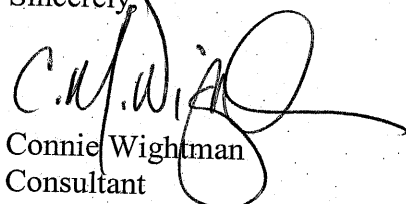
The Verizon affiliates utilize the services of an underlying carrier as a switchless reseller. Therefore, Verizon affiliates are dependent upon the identification of toll free calling based on the systems and databases of the underlying carrier. Currently the underlying carrier of the Verizon affiliates is Worldcom in Tennessee.

The Verizon affiliates have no suggestions as to how the proposed workshop should proceed, but offer any support required or requested by the TRA.

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose.

Questions regarding this filing may be directed to my attention at (407) 740-8575 or via e-mail at cwightman@tminc.com.

Sincerely,


Connie Wightman
Consultant

cc: Cheryl Powers
Kim Kresslein
File: VLD - TN
VES - TN
TMS: VLD TNx0307
VES TNx0309



210 N. Park Ave.
Winter Park, FL
32789

P.O. Drawer 200
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Tel: 407-740-8575
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tmi@tminc.com

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September 30, 2003

2003 OCT - 1 AM 11:15
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T.R.A. DOCKET ROOM

Mr. Ron Jones
Director/Moderator
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219-0412

**Re: Docket 03-00502: Implementation of County Wide Calling
Response of TON Services, Inc.**

Dear Mr. Jones:

TON Services, Inc. ("TON") submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

TON Services, Inc. ("TON") is a nationwide long distance reseller whose sole operations in Tennessee consist of the provision of resold long distance service via prepaid debit cards. TON retails its prepaid debit cards only at travel plazas owned by its parent company, Flying J Inc. TON does not provide long distance service to presubscribed customers in Tennessee or any state.

TON has no other business or customer relationship with the individuals who purchase its prepaid cards. TON does not know if any customers use TON's cards to place local calls. Any call placed using TON's cards would be carried over the transport facilities of TON's underlying toll carrier and would be handled as a toll call, whether terminated to a local calling area or not.

The company does not have the data bases necessary to identify TN intracounty calls on an NPA-NXX basis. Since prepaid cards can be purchased and used anywhere in the country, it is not feasible to provide route-specific call rating. To obtain the data and attempt to devise a method to do so would cost more than TON's intrastate revenues over ten years. If an individual called and stated that a call placed using the prepaid card was intracounty and should not be debited from the card, TON would have no way to verify that claim. TON has received no such complaint to date.

Moreover, TON believes that individuals who elect to use a prepaid card for a local or intracounty call do so for the sake of convenience, as there are other options available, such as the user's home phone or dialing directly from a payphone, where the call could be placed toll-free.

September 30, 2003
Mr. Ron Jones
Director/Moderator
Tennessee Regulatory Authority
Page 2

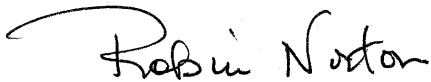
The operational difficulties and expense of implementing real time intracounty toll free calling for prepaid debit cards would be a true impediment for small competitors. The gains to the public would be miniscule compared to the cost.

The company has no suggestions as to how the proposed workshop should proceed, but would offer any support required or requested by the TRA.

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose.

Questions regarding this filing may be directed to my attention at (407) 740-3004 or via e-mail at rnorton@tminc.com.

Sincerely,



Robin Norton
Consultant to TON Services, Inc.

cc: Neil Vos - TON
File: TON - TN
TMS: TNx0301



210 N. Park Ave.
Winter Park, FL
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2003 OCT -1 AM 11: 20

T.R.A. DOCKET ROOM

September 30, 2003
Via Overnight Delivery

Mr. Ron Jones
Director/Moderator
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219-0412

**Re: Docket 03-00502; Implementation of County Wide Calling
Response of Consolidated Communications Operator Services, Inc.**

Dear Mr. Jones:

Consolidated Communications Operator Services, Inc. ("CCOS") submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

CCOS was approved to provide operator assisted services in DN 03-00229 by order issued August 6, 2003. CCOS has not yet begun operations in Tennessee. CCOS will not provide presubscribed services to customers in Tennessee. CCOS calls will be operator treated and billed via LEC billing through a third party billing aggregator. Local calls would not normally route through the company if the customer follows the dialing instructions on the phone or tent card. To the extent that customers may occasionally dial local calls as if they are long distance, CCOS would handle these incidental calls and bill them like any other toll calls. The company does not have the data bases necessary to identify intracounty calls on an NPA-NXX basis. In order to obtain the necessary information, the company would have to invest substantially more than the amount of revenue it expects to generate in Tennessee.

The operational difficulties and expense of implementing real time intracounty toll free calling for operator-handled calls are a true impediment for small competitors. The gains to the public would be miniscule compared to the cost. CCOS suggests a mileage surrogate for small companies would be a reasonably inexpensive approach that could be easily implemented.

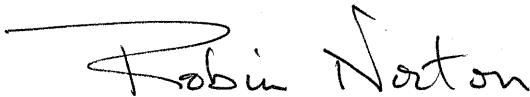
The company has no suggestions as to how the proposed workshop should proceed, but would offer any support required or requested by the TRA.

September 30, 2003
Mr. Ron Jones
Director/Moderator
Tennessee Regulatory Authority
Page 2

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose.

Questions regarding this filing may be directed to my attention at (407) 740-3004 or via e-mail at rnorton@tminc.com.

Sincerely,

A handwritten signature in cursive script that reads "Robin Norton". The signature is written in dark ink and is positioned below the word "Sincerely,".

Robin Norton
Consultant to Consolidated Communications Operator Services, Inc.

cc: Jennifer Craig - CCOS
File: CCOS - TN
TMS: TNx0301

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2003 OCT -1 AM 9:19

T.R.A. DOCKET ROOM

September 30, 2003

Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

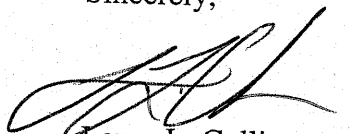
Re: OneStar Long Distance, Inc.; Docket No. 03-00502; Workshop to Gather Information from the Telecommunications Industry Related to Preventing Violations of Tennessee Code Annotated § 65-21-114(a)

Dear Sir or Madam:

Enclosed please find OneStar Long Distance, Inc.'s response to the Tennessee Regulatory Authority's request for information in Docket No. 03-0052, Workshop to Gather Information from the Telecommunications Industry Related to Preventing Violations of Tennessee Code Annotated § 65-21-114(a).

Please do not hesitate to contact me should you have any questions. I can be reached via telephone at (812) 437-7791, facsimile at (812) 437-7988, or electronic mail at lcollier@onestarld.com.

Sincerely,



Laura L. Collier
Regulatory Manager

Enclosures

OneStar Long Distance, Inc.

Docket No. 03-00502

**Workshop to Gather Information from the Telecommunications
Industry Related to Preventing Violations of Tennessee Code Ann.
§ 65-21-114**

1. Describe the manner in which you are able to provide telecommunications service in compliance with Tennessee Code Annotated § 65-21-114(a). If you do not currently take steps to ensure compliance with § 65-21-114(a), explain your reason for not doing so.

OneStar Long Distance, Inc. ("OneStar"), a reseller of long distance telecommunications services, monitors calls via its own billing system, as well as makes use of data provided to it by its underlying carriers, in order to ensure compliance with § 65-21-114(a).

2. Identify any technical, operational, administrative, or other difficulties encountered when attempting to comply with Tennessee Code Annotated § 65-21-114(a).

OneStar, at this time, does not have any difficulties to report.

3. Provide a suggestion for how this workshop should proceed.

OneStar does not have any suggestions at this time.